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September 13, 1995

Rosalind K. Allen, Chief
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Wireless Telecommunications Bureau
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re: PR Docket No. 93-144 (RM-8117, RM-8030, RM-8029) and
PP Docket No. 93-253
Further Notice of Proposed Rule Making
Written Ex Parte Presentation

Dear Ms. Allen:

At paragraphs 42 and 43 of the *Further Notice of Proposed Rule Making* in PR Docket No. 93-144 ("FNPRM"), the Commission requested comments on a Commission proposal to adopt an emission mask for 800 MHz SMR licensees that will operate within an MTA service area. The mask proposed is currently identical to that adopted for PCS licensees. Specifically, at paragraph 43 of the FNPRM the Commission proposed that "...outside an MTA licensee's frequency block, the power of any emission shall be attenuated below the transmitter power (P) by at least 43 plus $10 \log_{10} (P)$ decibels or 80 decibels, whichever is the lesser attenuation." Having reevaluated the Commission's proposal taking into account the current state of equipment used for Part 90 800 MHz SMR service, Ericsson believes the proposed mask can be improved without creating the potential for additional adjacent channel interference. Ericsson's proposed mask is a hybrid mask that combines the FCC's proposed mask and the existing Part 90 mask for 800 MHz SMR licensees.

The mask proposed by the FCC for MTA-based licensees is more strict than the current Part 90 mask set forth in Section 90.209. That is, under the proposed mask emissions at the band edge must be attenuated to a greater extent than under the Section 90.209 mask for 800 MHz

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services. As a result, manufacturers of Part 90 800 MHz SMR equipment may be forced to make major modifications to existing equipment so it can continue to be used for 800 MHz services. Ericsson submits that a very minor modification to the proposed mask will enable manufacturers to design equipment to be used by existing Part 90 licensees as well as by proposed MTA-based 800 MHz SMR licensees. Ericsson submits that the proposed "mask rule" should be modified to read as follows:

For any frequency outside a licensee's frequency block, the power of any emission shall be attenuated below the transmitter power (P) by at least ***116 log (f/6.1) decibels or 43 plus 10 log₁₀ (P) decibels or 80 decibels, whichever is the lesser attenuation where f is the frequency removed from the center of the outer channel in the block in kilohertz and where f is greater than 12.5 kHz.*** (emphasis supplied)

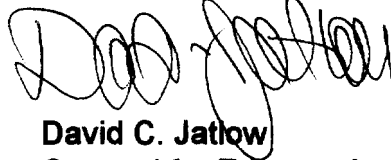
A graphic depiction of Ericsson's proposed mask superimposed on the Commission's proposed mask is attached hereto.

As noted above, use of Ericsson's proposed mask will (1) provide for a graceful transition from the existing regulatory scheme to that proposed in the FNPRM and (2) enable manufacturers to make 800 MHz SMR equipment available for MTA-based licensees more rapidly and less expensively which will inure to the benefit of such licensees and ultimately to subscribers of these services. Moreover, Ericsson's proposed mask

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will not increase the potential for interference since emissions outside the band edge are fully consistent with those currently allowed under existing Part 90 rules for 800 MHz SMR licensees.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David C. Jatlow", written over the typed name.

**David C. Jatlow
Counsel for Ericsson Inc.**

**cc: Mr. Ed Jacobs
Mr. Jay Jackson
D'Wanda Speight, Esq.**

Illustration of Out-of-Band Emission Mask Rules for 100W Transmitter Power

